

# Exhibit B



**From:** Lawrence Matasar <larry@pdxlaw.com>  
**Subject:** info on Pete Seda  
**Date:** August 13, 2007 11:09:13 AM PDT  
**To:** lisa\_brown@orpt.uscourts.gov



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Lisa - Thanks very much for call.

Here is some information about Pete's travels, his finances, and other material.

1. Recent Travels:

First, Hajj in Mecca and Saudi Arabia for about 6 months  
then, United Arab Emirates (Dubai/Sharjah) for about 18 months  
then, Tehran, Iran for about 18 months  
then, Damascus, Syria for about 1 year

2. Finances:

While he away he could not find good work. Before he left the USA, he sold his house for approximately \$470,000, having purchased it for about \$200,000. Plus he has maxed-out his credit cards.

3. Misc.

Pete has always been against violence and terrorism. He was nominated for an Imagine Peace Award (Jeff Golden knows about this.) Pete also is the author of "Islam Is," a book which has been translated into 7 languages. You can find at this link: <http://www.islam-is.com>



In Saudi Arabia totaling 6 months:

1. Feb 2003, Appx 2 weeks, To Riyadh then Mecca for hajj, stayed in Mina Azizia area in Mecca
2. 1.5 months, Riyadh, Saudi Arabia, Nakheel area, from freeway take the Nakheel exit east bound, first group of shops on the right, directly over a dry cleaning store, second floor, door of the right apartment
3. Appx 1 month (right after the war in Iraq started) Riyadh, Saudi Arabia, Exit 16, North bound from the freeway, Exit 16, left over the bridge to first light, turn and after 200 meters take the first right, middle of the block, white entrance, second door of the front apartment.
4. Appx 3.5 months, Riyadh, Saudi Arabia, Nakheel second address, Freeway at Nakheel exit, east bound to the first traffic light, at the intersection make a right, first road past the gas station on the right, first set of buildings on the right, has a green gate, immediately after entering make a right, end, follow left to end, building in front, ground level

In United Arab Emirates (Dubai/Sharjah) Appx 1.5 years:

1. Appx Aug 2003, Dubai, Diera (an area in Dubai close to the airport), first few nights in Continental Hotel, when family arrived from US after a day we moved to Sharjah (next door to Dubai), Rents were much cheaper in Sharjah
2. Appx 1.2 months, Mujaarrah (an area in Sharjah), From the end of Malik Faisal roundabout at Sharjah Cornich make a right, Appx 1 kilometer past shops immediately past the second mosque make a right turn, first building on your left is Mujaarrah Residence Apartments, on I think the 6<sup>th</sup> floor on left east side
3. Appx 2 months, Sharjah, Immigration Rd. by Sharjah Mega Mall, From Sharjah Cornich go east on Immigration Rd. toward Mega Mall, just before intersection make the last right turn, first building on the right, I think 4<sup>th</sup> floor apartment 1
4. Until I left for Iran, final address in Dubai, Malik Faisal Rd. by Spinneys, From Dubai Sharjah Rd. take malik Faisal Rd. toward Sharjah Cornich and the Gold Souq, pass the first light, exactly across the street from Spinneys make a right, the first building directly in front, Cobaisi Building, Seventh Floor, turn left at the end, (cant read what is written next, maybe apartment #?)

In Tehran, Iran, Appx. 1.8 years, from before my indictment until 23 days before Ramadhan of 2006

1. Appx 2 months, First address in Tehran, Iran, Maydane Hafte Teer (or Seventh of Tir Square), Shaheed Lotfi Street, Khosrow Ally #22-24, second floor
2. Appx. 1.5 months, Second address on Tehran, Iran, Abas Abad, 3<sup>rd</sup> building east of state of Tehran building, the door by the barrier, second floor, door on the right in the front
3. Exactly 1 year, Third address in Tehran, Iran, Velenjak Golestane Sevom Rostane Dovom, Pelake 7 (Number 7), Tabagheya Haft (Seventh floor), Apartemane Gharbi (Left Western Apartment)
4. Appx . 4 months, Last address in Tehran, Maydane Hafte Teer (or Seventh of Teer Square) Shaheed Lotfi Street, Khosrow Ally #22-24, fifth floor

In Damascus, Syria, Appx 11 months, Arrived just before Ramadhan of 2006 until August 14, 2007 when I came through Frankfurt to Portland Oregon.

1. Appx. 1.5 months, When I first arrived in Syria I stayed the first night in a suburb of Damascus called Sayed Zainab, then I moved to 2 hotels in Marja or Shohada Square Hotel called Imad Hotel for about 3-4 nights then to Omar Khayam Hotel for about 1.5 months
2. Appx 5 months, Sahat Al Arnoos, Pakistan St., Ally opposite Bulgarian Embassy, directly above the office of Dr. Abu Harb, Apartment #3, ground floor
3. Appx 4.5 months, Sahat Al Arnoos, Pakistan St., west of the Bulgarian Embassy, Omar Mukhtar Street, Building #8, 3<sup>rd</sup> floor, last apartment #3



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LAWRENCE MATASAR  
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KRISTA SHIPSEY  
Email: krista@pdxlaw.com

September 7, 2007

Lisa Brown  
US Pretrial Services  
United States Courthouse  
405 E 8<sup>th</sup> Avenue  
Eugene, OR 97401

RE: *United States v. Pirouz Sedaghaty*,  
US District Court Case No. CR 05-60008

Dear Ms. Brown:

I am writing to follow up on our recent meeting with Judge Coffin and AUSA Chris Cardani. This letter will provide you with additional information on Mr. Sedaghaty. Even in the limited time available, we have been able to track down documentary evidence to show that Mr. Sedaghaty was living openly and legitimately in each of the countries he told you about. He was using his own name, obtaining and using the necessary documents, passports, driver's licenses, etc. in each of the countries, and attempting to make a living through legitimate businesses. There was nothing clandestine or furtive about his activities during the past four and one half years.

At least of equal importance, given the government's efforts to paint Mr. Sedaghaty as a terrorist, is the documentation of his ties to the United States and his strong, public positions for peace and against terrorism. At the detention hearing, we covered his actions and beliefs while he was living in Oregon. The depth of his beliefs and feelings is demonstrated by the information, described below, that shows he continued to express and act on these beliefs after he moved to the Middle East and that he did so notwithstanding the fact that it put him and his family in danger.

First, I will include scans of some documents that verify his location at the times he has previously provided.

A scan from a shoe store showing he was in Damascus, Syria in April, 2007:

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PASHAYAN FOR ORTHOPEDIC FOOTWEAR  
AND FOOT CARE  
DAMASCUS SYRIA SALHIYE - SHUHADA  
TEL : 9992 FAX : 5122988  
www.pashayan.com e-mail: pashayan@mail.sy  
NAME: السيد يوسف

ADDRESS:

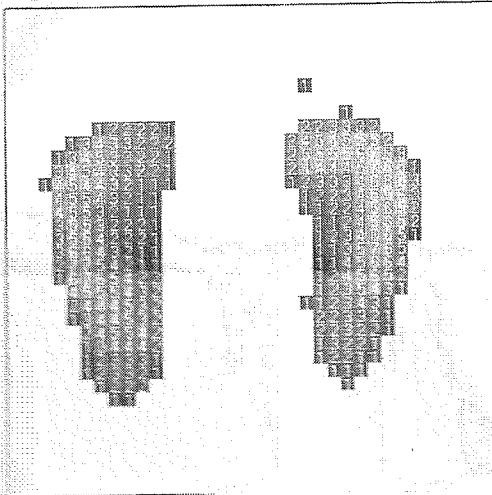
PHONE:

GENDER: MALE

EMAIL:

	Left	Right
Avg kg/sensor:	0.5033	0.5452
UMax kg/sensor:	1.0275	1.3631
LMax kg/sensor:	1.3421	1.3001
Total Area:	149	140
Arch Type:	Low	Low
MT Pressure:	No MT	No MT
Shoe Size:		
Width:		

Comments:



Test Type: Postural  
Date: 12/04/2007  
Recommended Orthotic(s):

LYNCO  
**L520**

PASHAYAN  
FOR ORTHOPEDIC FOOTWEAR  
AND FOOT CARE



باشايان  
الأحذية الطبية والعناية بالقدم

المحترم ..... حضرة السيد

دمشق - صالحيه - شهداء - هاتف: ٤٤٧٩١٤ - ٢٢١٢٠٩٩ - ٥١١٧٩٨٨ - فاكس ٥١٢٢٩٨٨  
Damascus - Salih'ya - Shuhada - Tel. 4447214 - 3312099 - 5117868 - Fax 5122988

Customer Services 9992 خدمة الزبائن

E-mail pashayan@mail.sy

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A September, 2006 Iran driver's license:

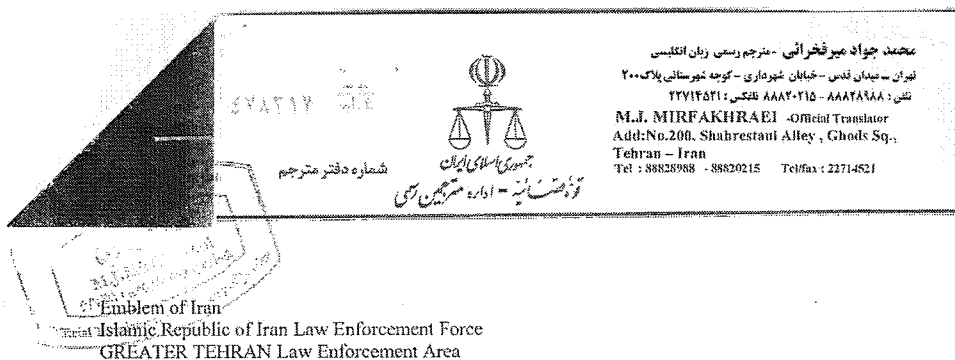


Photo of the holder

## DRIVING LICENCE

### 2<sup>ND</sup> CLASS

Serial No. : 8400145432  
Date of Issue : June 12, 2005  
Validity : 10 years

Name & Surname : PEROUZ SEDAGHATY  
Father's name : Mohammad  
Date of Birth : Dec. 21, 1958  
National Code : 0043757502

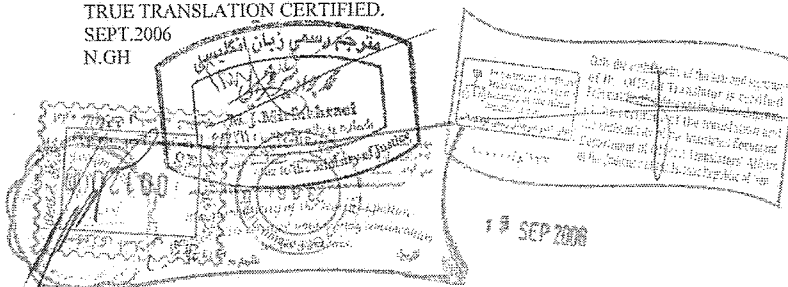
Signed and Sealed : Chief, Police Dept.

### Remarks :

- 1- If found, please mail it.
- 2- This license is valid for driving motor vehicles i.e. Sedan, Station-Wagon, Pick-up with the laden weight of 3500 kgs. Maximum and for driving public transport motor vehicles.
- 3- The holder must be at least 23 years old and one year should have elapsed since the issuance of the driving license.
- 4- Driving a taxi shall be subject to holding a special card in addition to a driving license.

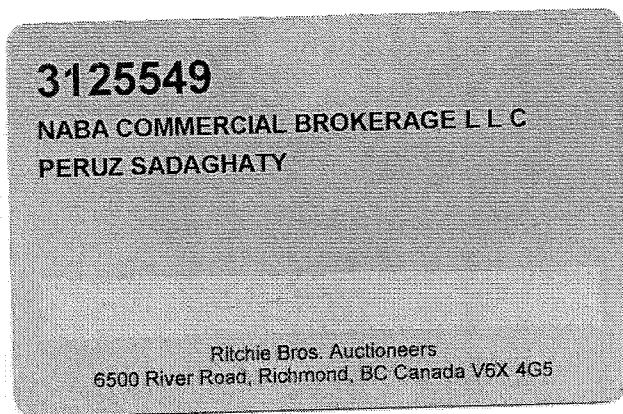
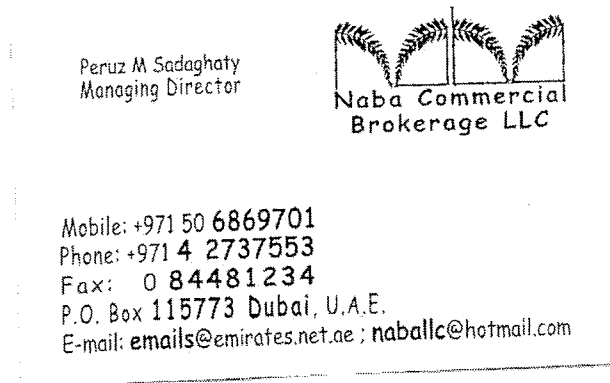
Signed and Sealed: Chief, Law Enforcement.

TRUE TRANSLATION CERTIFIED.  
SEPT. 2006  
N.GH



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His business card from Dubai:



His business card from Syria:





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His business card from Saudi Arabia:

Pete Seda  
Business Consultant

Mobile: 966-55625634      p1940s@hotmail.com

P.O.Box 5333 Riyadh 11422, Saudi Arabia

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A rental quote from a potential business transaction in Dubai:

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# WMC ENTERPRISES FZE

LB01-128, Jebel Ali Free Zone, P. O. Box : 18208  
Tel.: +971-4-8871156, Fax: +971-4-8813259  
Dubai, United Arab Emirates  
E-mail: info@wmc-e.com



## مشاريع دبي و ام سي

إلى بي ١٢٨-١٢٨، المنطقة الحرة جبل علي، ص.ب. : ١٨٢٠٨  
هاتفون : ٨٨٧١١٥٦-٩٧١، فاكس : ٨٨١٣٢٥٩-٩٧١  
ب.ب. : الإمارات العربية المتحدة  
بريد الكتروني: info@wmc-e.com

Att: Mr. Sadaghaty  
Subject: Naba Commercial Brokerage  
Mob: +871-50-6869701  
Fax: +971-4-4481234  
Subject: Used Earthmoving Equipment

Date: 14th October, 2004

### Quotation

Please find hereunder the following available machines Quotations on your request.  
All Prices Ex-Jable Ali port Dubai, prior to sale.

				FOB	
Make & Model	S/No	Year	Qty.	Price FOB Dubai	
<b>Rough Terrain Crane:</b>					
				Arriving	AED
TADANO TR250M-4	25Ton	518420	1991	1	265,000
KATO KR-26H-VL	25 Ton	2431862	1990	1	25-Oct 240,000
TADANO TR200M-4	20Ton	521212	1989	1	210,000
<b>Excavators:</b>					
CAT 320	3XM04234	1996	1		215,000
CAT 320	3XM04030	1995	1		215,000
CAT 321 BLCR	9CZ00181	1999	1		200,000
CAT 320	7GJ04369	1994	1	25-Oct	180,000
CAT 320L	8H100639	1993	1	25-Oct	180,000

Please do not hesitate to contact us accordingly.

Thanks & Regards  
Mohsin Kamal  
Manager

YARD ADDRESS: Plot No. S-10513, P. O. Box: 18208, Jebel Ali Free Zone (South) Dubai - U.A.E.

Given the government's extreme efforts at the detention hearing to paint Mr. Sedaghaty as a terrorist, it is important to note that his ties to the United States and his strong, public positions for peace and against terrorism caused him to be viewed with great suspicion in many parts of the Middle East. For example, he sought to distribute in Saudi Arabia and in Dubai, The United Arab Emirates his own, non-violent anti-terrorism writings on Islam, *Islam Is . . . .* Here is a copy of the permit he obtained for its distribution in Dubai.

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لن يعمه الأمر

إجازة طباعة ونشر

الحمد لله رب العالمين والصلوة والسلام على سيدنا محمد، طيب الأبي وعن الله سبحانه.  
بعد الإطلاع على كتاب : "Islam Is . . ."  
تأليف (بيتي سدا) : By : Pete Seda  
لأنه لا مانع لدينا من تداوله ونشره.  
دون إلزامي مسؤولية للدائرة، فيما يتعلق بحقوق الغير.

مدير إدارة الإعلام والثقافة

تاريخ: ٢٠٠٧/٠٩/٠٦

NB

TEL: 2068888  
FAX: 2068888  
P.O. BOX: 123456789

Further evidence of Mr. Seda's public ties to the United States during this period is found in this photograph, taken in Dubai, of Mr. Sedaghaty standing just to the left of the US Ambassador to the United Arab Emirates, Ms. Michele J. Sison.



Moreover, even when Mr. Sedaghaty lived in Saudi Arabia, which is one of the more friendly countries to the USA, someone spray painted on his parking space at

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about the time the Iraq war began, in Arabic: "AMERICA IS THE ROOT OF ALL EVIL." This incident was reported to the US Embassy. Mr. Sedaghaty believes this vandalism, which was viewed by authorities as a threat, was a response to his comments against terrorism on Saudi television, and perhaps as a response to his book, of which I understand about 50,000 copies were distributed in Saudi Arabia and about 20,000 copies in the UAE.

Unfortunately, due to cultural differences, Saudi Arabia, The United Arab Emirates and Syria do not use post-office addresses like we do in the United States. I will not be able to provide addresses from these countries beyond the locations Mr. Sedaghaty already provided. I may be able to obtain exact addresses for Iran; if so, I will provide them. However, I suggest you contact Mr. Seda's ex-wife, Laleh, his wife, Summer, or his sons Joseph and Jonah to verify his general living and employment information. Laleh's email address is: [laloochka@gmail.com](mailto:laloochka@gmail.com). I have previously given you contact information for the others.

You asked me to provide you with additional passport information. Mr. Sedaghaty has only two valid passports, one from the USA and one from Iran. You have both of them, and have provided me with copies. He has an invalid US passport and an invalid Iran passport, both of which I expect to be able to provide at the September 10 hearing.

Due to the current state of international relations between the United States and the peoples of Saudi Arabia, The United Arab Emirates, Iran, and Syria, I do not believe that either you or US government law enforcement officers will be able to obtain accurate information about my client from people living in those countries, particularly if law enforcement takes the approach used by Mr. Cardani in his questioning of defendant's character witnesses at the detention hearing. I expect if a FBI agent or a US Pretrial Services officer calls Iran, Syria or even Saudi Arabia, they would be met with extreme skepticism. Thus, I do not believe I can give you much information that can be verified from persons other than Mr. Seda's family. Also, because of the financial aspects of the underlying case and the government's approach, I will not be able to give you all the financial information you seek.

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I will provide additional relevant documents if I obtain them. As you may know, I am in Chicago and Ann Arbor for the rest of this week. (This will explain any formatting or other errors in this document.) You may contact me via email or cell phone, 503-9574595.

Yours truly,

LAWRENCE MATASAR

cc: Steven T. Wax  
Pirouz Sedaghaty